

EXHIBIT B

1 Lauren Foster

2 interview of Sergeant Taylor and Sergeant
3 Taylor's driver.

4 What is -- I just want to pause
5 there.

What is a GO 15 interview?

7 A. It is the same thing as PG
8 206-13. It is the authority under which the
9 ability to conduct the compelled testimony
10 exists. And prior to the creation of 206-13,
11 it was known as a GO 15, so they are
12 interchangeable.

Q. Okay. Thank you.

14 And then I am to going skip down
15 to this last sentence. Sergeant Wong advised
16 that the rosters of possible sergeants
17 attached to her case file total approximately
18 300 sergeants. It was unclear how the
19 universe came to be narrowed to that number.

20 So one of my questions to you is,
21 you know, how does an IAB investigator go
22 about narrowing the potential sergeants who
23 might be involved in a particular incident?

24 A. First, I would -- Sergeant Wong
25 is not an IAB investigator.

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2 this opportunity to call for production,
3 to the extent it hasn't been produced,
4 because I think the one I showed is the
5 one I have.

6 MS. JACOBS: I just ask that it
7 be put in writing.

8 MS. MARQUEZ: Okay. Understood.

9 Q. So just to focus on these
10 entries, Captain, 580, 581 and 582, there is
11 reference to a Sergeant Hewitson, who
12 ultimately was indicted as the subject
13 officer in the CCRB case.

14 So my question just to you -- and
15 I understand that this is an investigation,
16 unit investigator, but do IAB investigators
17 interface with CCRB investigators in the same
18 way as this document is suggesting that CCRB
19 investigators interfaced with investigation
20 unit investigators?

21 MS. JACOBS: Objection, outside
22 the scope.

23 A. Yeah, I am not sure.

24 This seems to be a lot of
25 interfacing.

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I don't know -- I don't know how common this level of interaction is.

Q. Okay. Would, for instance, an IAB investigator know if a CCRB investigator has identified a subject officer?

A. Not necessarily, unless the CCRB investigator shared that information.

Q. Okay. So it is not as a matter of course that the two are sharing information in that way?

A. No.

Q. Okay. And I guess as an extension of that, would they -- as a matter of protocol, or in practice, an IAB investigator let a CCRB investigator know when they are going to do an interview of a particular officer?

A. No, that wouldn't be.

Q. Or the vice versa, are you aware of CCRB investigators giving heads up in that way to the IAB?

A. That would not be common.

Q. Okay. Okay. Is there any other -- can you describe the general sense